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November 5, 2012

By ECF

The Hon. John Gleeson  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

***Re: United States v. Agron Hasbajrami,  
11 Cr. 623 (JG)***

Dear Judge Gleeson:

We represent Defendant Agron Hasbajrami in the above-referenced matter and write to respectfully request a brief 13-day adjournment of the deadline for sentencing-related submissions in the above-referenced matter, as well as a similar adjournment of the defendant's sentencing hearing.

As this Court is aware, on April 12, 2012, the defendant pleaded guilty to Count Two of the Superseding Indictment, which charged him with attempting to provide material support to terrorists in violation of 18 U.S.C. § 2339(A). At the conclusion of the plea hearing, this Court scheduled sentencing for September 14, 2012, but reserved judgment on whether to accept the defendant's plea and directed the parties to file submissions, jointly or separately, pursuant to U.S.S.G. § 6B1.2. Said hearing and submissions were thereafter adjourned to November 16, 2012, at 3:30 p.m., and November 8, 2012, respectively.

On September 20, 2012, the defense submitted to the Probation Department its objections to the defendant's Pre-Sentence Report ("PSR"). Similarly, on September 28, 2012, the Government provided the Probation Department with a joint agreed stipulation regarding additional modifications to the defendant's PSR. In response, the Probation Department prepared an addendum to the PSR to address the parties' objections, however, the defense only received those objections today. Also, due to Hurricane Sandy, defense counsel have both been facing power outages and travel disruptions for the past week. While we both now have power, as do our families, the storm has caused a significant pile-up of deadlines that now must be sorted through.

I have spoken with Assistant United States Attorney Seth DuCharme and the Government has no objection to the instant application.

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Wherefore, defense counsel respectfully requests that both parties be permitted until November 21, 2012, to file joint or separate submissions regarding U.S.S.G. § 6B1.2, and that the defendant's sentencing hearing be adjourned to a date and time in December that is convenient to the Court.

During the first three weeks of December, the only dates that the parties are unavailable are December 3, 4, 13, and 14.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'MKB', followed by a long horizontal flourish.

Michael K. Bachrach  
Steve Zissou  
*Attorneys for Defendant Agron Hasbajrami*

MKB/mb

cc: AUSA Seth DuCharme